

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A
TO COMPLAINT and JOHN AND JANE
DOES 1-1000,

Defendants

Adv. No.: 23-01092 (MBK)

APPLICATION FOR ORDER SHORTENING TIME

The Ad Hoc Committee of Supporting Counsel (the “AHC of Supporting Counsel”), by and through its undersigned counsel, requests that the time period to notice a hearing on its *Motion of Ad Hoc Committee of Supporting Counsel to Intervene* (the “Motion”)² as required by Fed. R. Bankr. P. 2002 be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and respectfully submit:

1. A shortened time hearing is requested because: Time is of the essence with respect to the Motion as the Adversary Proceeding and the related appeal are moving rapidly. Following the Bankruptcy Court's *Order Dissolving Temporary Restraining Order, Extending the Automatic Stay, and Granting Limited Preliminary Restraints*, [Adv. ECF No. 91], the TCC filed an appeal and requested certification of the appeal directly to the Third Circuit. In addition, on May 1, 2023, the TCC filed *Public Petition for Writ of Mandamus of Official Committee of Talc Claimants* with the United States Court of Appeals for the Third Circuit [ECF No. 387]. The AHC of Supporting Counsel represents counsel to tens of thousands of named defendants in the Adversary Proceeding who support the Debtor’s plan for resolving all current and future talc claims.³ The members of the AHC of Supporting Counsel and their respective

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

³ Undersigned counsel is working diligently on preparing a master Rule 2019 statement that consolidates all required information for the members of the AHC of Supporting Counsel and their clients.

clients need to be heard on the matter pending appeal because they are named defendants and are completely at odds with the only other entities that are purporting to speak for the defendants – the TCC and another ad hoc committee of Non-Consenting Claimants. Both of those entities oppose the settlement and overall goal of the Chapter 11 Case and, by extension, the interests of the AHC of Supporting Counsel’s constituents. Absent a decision on the Motion prior to the commencement of the appeal, the AHC of Supporting Counsel’s right to be heard on critical issues that affect their claimants’ rights will be severely impaired.

2. State the hearing dates requested: The AHC of Supporting Counsel respectfully requests that the Court hear the Motion no later than May 9, 2023 subject to the Court’s availability. A hearing no later than May 9, 2023 balances the AHC of Supporting Counsel’s need to intervene in the Adversary Proceeding and comply with Fed. R. Bankr. P. 2002 with its desire to provide parties in interest with an opportunity to review the Motion in advance of the hearing.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1). The AHC of Supporting Counsel requests entry of the proposed order shortening time.

Dated: May 2, 2023

COLE SCHOTZ P.C.

/s/ Michael D. Sirota

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